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Robert J. Lemons

Attorneys for Lehman Brothers Holdings Inc. and  
Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
Debtors.	: (Jointly Administered)
	:
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**CERTIFICATE OF NO OBJECTION UNDER  
28 U.S.C. § 1746 REGARDING OMNIBUS CLAIMS  
OBJECTIONS SCHEDULED FOR HEARING ON JULY 25, 2013**

TO THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), or LBHI as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of LBHI and its Affiliated Debtors (the "Plan Administrator"), filed the following motions

and omnibus claims objections (collectively, the “Claims Objections”) with the Court for hearing on or before July 25, 2013:

- (a) Motion Pursuant to Section 502(c) of the Bankruptcy Code and Section 9.3 of the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors to Estimate the Allowed Amounts of Certain Employee Indemnification Claims [ECF No. 38023];
- (b) Debtors’ Two Hundred Nineteenth Omnibus Objection to Claims (Valued Derivative Claims) [ECF No. 20787];
- (c) Four Hundred Seventeenth Omnibus Objection to Claims (No Liability Derivatives Claims) [ECF No. 37956];
- (d) Four Hundred Eighteenth Omnibus Objection to Claims (No Liability Claims) [ECF No. 38010];
- (e) Four Hundred Nineteenth Omnibus Objection to Claims (Insufficient Documentation Claims) [ECF No. 38012];
- (f) Four Hundred Twentieth Omnibus Objection to Claims (Employment-Related Claims) [ECF No. 38014]; and
- (g) Four Hundred Twenty-First Omnibus Objection to Claims (No Liability Derivatives Claims) [ECF No. 38018].

2. In accordance with the Second Amended Case Management Order, the Debtors, or the Plan Administrator, as applicable, established deadlines (the “Response Deadline”) for each Claim Objection for parties to object or file responses. The Response Deadlines have been extended for certain creditors from time to time. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadlines have now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objections have been (a) filed with the Court

on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Debtors or the Plan Administrator (or such responsive pleadings have been withdrawn) by any of the holders of the claims included on Exhibit 1 to any of the Orders attached hereto, which include only the proofs of claim for which the Claims Objection will be granted. Responses to certain of the Claims Objections were filed on the docket, or served on the Debtors or the Plan Administrator, by holders of certain proofs of claim included on the Claims Objections. The hearing on the Claims Objections as to any proof of claim for which a response was either filed on the docket or received by the Debtors or the Plan Administrator, and which response has not been resolved, has been adjourned to a future date.

4. Accordingly, the Debtors and the Plan Administrator respectfully request that the proposed orders granting the Claims Objections annexed hereto as Exhibits A and G, which, except for the inclusion of additional language to indicate that such order is supplemental to a previously entered order for a Claim Objection or to reference the inclusion of separate exhibits attached to the proposed orders for proofs of claim for which the Claims Objection is granted, adjourned or withdrawn, are unmodified since the filing of the Claims Objections, be

entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: July 24, 2013  
New York, New York

/s/ Robert J. Lemons

Robert J. Lemons

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Attorneys for Lehman Brothers Holdings Inc. and  
Certain of Its Affiliates

**EXHIBIT A**  
**(Proposed Order – ECF No. 38023)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re</b>	:
	:
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:
	:
<b>Debtors.</b>	:
	:
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**Chapter 11 Case No.**  
**08-13555 (JMP)**  
**(Jointly Administered)**

**ORDER PURSUANT TO SECTION 502(c) OF THE BANKRUPTCY CODE AND  
SECTION 9.3 OF THE MODIFIED THIRD AMENDED JOINT CHAPTER 11 PLAN  
OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS  
ESTIMATING THE ALLOWED AMOUNTS OF CERTAIN PROOFS OF CLAIM**

Upon the motion (the “Motion”) dated June 18, 2013 of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”)<sup>1</sup>, for approval, pursuant to section 9.3 of the Plan and section 502(c) of title 11 of the United States Code (the “Bankruptcy Code”), to estimate the Allowed amounts of certain proofs of claim, all as more fully described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York;

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

(v) the Claimants listed on Exhibit 1; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and it appearing that no other or further notice need be provided; and a hearing having been held to consider the relief requested in the Motion; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Motion is granted as provided herein; and it is further

ORDERED that, pursuant to section 9.3 of the Plan and section 502(c) of the Bankruptcy Code, each of the claims identified on Exhibit 1 attached hereto (the “Employee Indemnification Claims”) is hereby estimated in the Allowed amount of zero dollars (\$0.00); and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A attached to the Motion that is not listed on Exhibit 1 attached hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all  
matters arising from or related to this Order.

Dated: New York, New York  
\_\_\_\_\_, 2013

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Honorable James M. Peck  
United States Bankruptcy Judge



**Exhibit 1**

**Claims to Be Estimated in the Allowed Amount of Zero Dollars (\$0.00):**

<b>Claimant Name</b>	<b>Claim Number</b>	<b>Date Filed</b>	<b>Debtor Name</b>	<b>Asserted Total Claim Dollars</b>
BEESON, LISA	12844	09/15/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
BERKENFELD, STEVEN	28480	09/22/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
BERTAGNA, ROBERT	27175	09/22/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
BLAIR, NATASHA	12841	09/15/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
CHAN, ANDREW L.	28731	09/22/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
GELBAND, MICHAEL	23808	09/21/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
HARBER, LANA	12856	09/15/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
HASH, STEVEN	31763	09/22/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
HEDLUND III, ROBERT G.	30057	09/22/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
HOLLEB, THOMAS J.	66496	04/02/2010	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
KELLY, MARTIN	18362	09/18/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
KRAVETZ, LARRY J.	27319	09/22/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
LAZARUS, DAVID	19336	09/18/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
MCGEE, HUGH	31080	09/22/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
MICHAELS, JEFFREY A.	66974	07/30/2010	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
MOHR, SCOTT W.	27180	09/22/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
ORLAN, FRED	22129	09/21/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
OVERLANDER, KEITH F.	23561	09/21/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
PEDONE, MICHAEL	22130	09/21/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
SHAH, ASHISH C.	33026	09/22/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated

SWEENEY, BRAD	28733	09/22/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
THOMPSON, SARAH C.	24581	09/21/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
TONUCCI, PAOLO	12667	09/15/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
TREILING, ERIC	18277	09/18/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
WELIKSON, JEFFREY A.	13919	09/16/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated
WELSH, JOHN M.	27176	09/22/2009	Lehman Brothers Holdings Inc.	Contingent / Unliquidated

**EXHIBIT B**  
**(Proposed Order – ECF No. 20787)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
 :  
**Debtors.** : **(Jointly Administered)**  
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**THIRD SUPPLEMENTAL ORDER GRANTING  
DEBTORS' TWO HUNDRED NINETEENTH OMNIBUS  
OBJECTION TO CLAIMS (VALUED DERIVATIVE CLAIMS)**

Upon the two hundred nineteenth omnibus objection to claims, dated October 12, 2011 (the "Two Hundred Nineteenth Omnibus Objection to Claims"),<sup>2</sup> of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the "Procedures Order"), seeking to reduce and allow the Valued Derivative Claims on the basis that the amounts listed on the proofs of claim are greater than the fair, accurate, and reasonable values determined by the Debtors after a review of the claimants' supporting documentation and the Debtors' books and records, as more fully described in the Two Hundred Nineteenth Omnibus Objection to Claims; and due and proper notice of the Two Hundred Nineteenth Omnibus Objection to Claims having been provided to (i) the U.S. Trustee; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) the claimants listed on Exhibit A attached to the Two

<sup>2</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' Two Hundred Nineteenth Omnibus Objection to Claims.

Hundred Nineteenth Omnibus Objection to Claims; and (vii) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [Docket No. 9653]; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Two Hundred Nineteenth Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Two Hundred Nineteenth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Two Hundred Nineteenth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that each Valued Derivative Claim listed on Exhibit 1 annexed hereto is hereby modified and allowed in the amount set forth on Exhibit 1 under the column heading “Modified Amount” and any asserted amount in excess of the modified amount is disallowed; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A to the Two Hundred Nineteenth Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

**IN RE LEHMAN BROTHERS HOLDINGS INC., ET AL., CASE NO: 08-13555 (JMP)****OMNIBUS OBJECTION 219: EXHIBIT 1 – VALUED DERIVATIVES CLAIMS**

ASSERTED						MODIFIED			
	NAME	CLAIM #	FILED DATE	DEBTOR	CLASS	AMOUNT	DEBTOR	CLASS	AMOUNT
1	CBARB, A SEGREGATED ACCOUNT OF GEODE CAPITAL MASTER FUND LIMITED ATTN: LISA LAMPERT, GENERAL COUNSEL ONE POST OFFICE SQUARE, 28TH FLOOR BOSTON, MA 02109	31921	09/22/2009	Lehman Brothers Special Financing Inc.	Unsecured	\$59,119.08*	Lehman Brothers Special Financing Inc.	Unsecured	\$40,000.00
TOTAL						\$59,119.08	TOTAL		\$40,000.00



**EXHIBIT C**  
**(Proposed Order – ECF No. 37956)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
 :  
 :  
**Debtors.** : **(Jointly Administered)**  
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**ORDER GRANTING FOUR HUNDRED SEVENTEENTH OMNIBUS  
OBJECTION TO CLAIMS (NO LIABILITY DERIVATIVES CLAIMS)**

Upon the four hundred seventeenth omnibus objection to claims, dated June 13, 2013 (the “Four Hundred Seventeenth Omnibus Objection to Claims”),<sup>3</sup> of Lehman Brothers Holdings Inc. (“LBHI” or the “Plan Administrator”) as Plan Administrator pursuant to the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors* for the entities in the above referenced chapter 11 cases, pursuant to section 502 of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the No Liability Claims on the grounds that they assert claims for which LBHI or Lehman Brothers Special Financing (“LBSF”) have no liability, all as more fully described in the Four Hundred Seventeenth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Seventeenth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Seventeenth Omnibus Objection to Claims is in the best interests of LBHI, LBSF and all parties in interest in the above

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<sup>3</sup> Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to such terms in the Four Hundred Seventeenth Omnibus Objection to Claims.

referenced chapter 11 cases and that the legal and factual bases set forth in the Four Hundred Seventeenth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Four Hundred Seventeenth Omnibus Objection to Claims is granted; and it is further

ORDERED that pursuant to sections 502(b) and 502(e)(1)(B) of the Bankruptcy Code, the No Liability Claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, the Guarantee Claim component of the proof of claim assigned number 58607 by the Court-appointed claims agent; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: July \_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

## OMNIBUS OBJECTION 417: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 ALRENE PTY LIMITED ATF THE FIRMAN	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/10/2009	11099	\$412,000.00	\$412,000.00	No Liability Claim - Derivative
2 ARC ENERGY LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32672	\$1,651,400.00	\$1,651,400.00	No Liability Claim - Derivative
3 ARC ENERGY LIMITED	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32684	\$780,400.00	\$780,400.00	No Liability Claim - Derivative
4 ARMIDALE DUMARESQ COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/24/2008	890	Undetermined	Undetermined	No Liability Claim - Derivative
5 BLAYNEY SHIRE COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32670	\$825,700.00	\$825,700.00	No Liability Claim - Derivative
6 BLUE MOUNTAINS CITY COUNCIL	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32639	\$737,478.00	\$737,478.00	No Liability Claim - Derivative
7 BLUE MOUNTAINS CITY COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32669	\$4,685,848.00	\$4,685,848.00	No Liability Claim - Derivative
8 BOYSTOWN	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/14/2009	12645	\$3,131,200.00	\$3,131,200.00	No Liability Claim - Derivative
9 BROKEN HILL CITY COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/24/2008	886	Undetermined	Undetermined	No Liability Claim - Derivative
10 CABONNE COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32679	\$949,555.00	\$949,555.00	No Liability Claim - Derivative

## OMNIBUS OBJECTION 417: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
11 CABONNE COUNCIL	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32686	\$234,120.00	\$234,120.00	No Liability Claim - Derivative
12 CENTRAL TABLELANDS WATER	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32678	\$759,644.00	\$759,644.00	No Liability Claim - Derivative
13 CENTRAL TABLELANDS WATER	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32691	\$234,120.00	\$234,120.00	No Liability Claim - Derivative
14 CITY OF ALBANY COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32640	\$2,823,894.00	\$2,823,894.00	No Liability Claim - Derivative
15 CITY OF ALBANY COUNCIL	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32646	\$1,638,840.00	\$1,638,840.00	No Liability Claim - Derivative
16 CITY OF RYDE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/24/2008	880	Undetermined	Undetermined	No Liability Claim - Derivative
17 CITY OF SWAN	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12/29/2009	66029	\$7,031,847.85	\$7,031,847.85	No Liability Claim - Derivative
18 CITY OF SWAN	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	12/29/2009	66030	\$1,170,600.00	\$1,170,600.00	No Liability Claim - Derivative
19 CRAIG WHITE PTY LTD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/14/2009	12157	\$2,183,600.00	\$2,183,600.00	No Liability Claim - Derivative
20 FIRMAN, JOHN JOSEPH/FIRMAN, JUDITH ANN/COLLIN, NICHOLAS JAMES/	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/11/2009	11513	\$412,000.00	\$412,000.00	No Liability Claim - Derivative

OMNIBUS OBJECTION 417: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
21 GILGANDRA COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32663	\$949,555.00	\$949,555.00	No Liability Claim - Derivative
22 GILGANDRA COUNCIL	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	02/19/2010	66308	\$468,240.00	\$468,240.00	No Liability Claim - Derivative
23 GLENROAD HOLDINGS PTY LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/14/2009	12156	\$824,000.00	\$824,000.00	No Liability Claim - Derivative
24 GOWING BROTHERS LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/24/2008	873	Undetermined	Undetermined	No Liability Claim - Derivative
25 GOWING WHALE FUND PTY LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/24/2008	872	Undetermined	Undetermined	No Liability Claim - Derivative
26 GOWINGS BROS LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	24733	\$4,120,000.00	\$4,120,000.00	No Liability Claim - Derivative
27 GOWINGS WHALE FUND P/L ATF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	24732	\$82,400.00	\$82,400.00	No Liability Claim - Derivative
28 GUYRA SHIRE COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/24/2008	871	Undetermined	Undetermined	No Liability Claim - Derivative
29 LANSELL PTY LTD ATF THE ALEX MARAKOFF SUPERANNUATION FUND	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	31346	\$247,200.00	\$247,200.00	No Liability Claim - Derivative
30 LEICHHARDT COUNCIL - ABN 92379 942 845	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32666	\$1,651,400.00	\$1,651,400.00	No Liability Claim - Derivative

## OMNIBUS OBJECTION 417: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
31 LITTLE COLLINS SPRING PTY LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/04/2009	10371	\$494,400.00	\$494,400.00	No Liability Claim - Derivative
32 MCCAMISH BROS (ORCHARDS) PTY LTD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/10/2009	11091	\$1,236,000.00	\$1,236,000.00	No Liability Claim - Derivative
33 MCMULLEN, DAVID AND FIONA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32653	\$743,130.00	\$743,130.00	No Liability Claim - Derivative
34 MOREE PLAINS SHIRE COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32650	\$5,367,050.00	\$5,367,050.00	No Liability Claim - Derivative
35 MOREE PLAINS SHIRE COUNCIL	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32690	\$390,200.00	\$390,200.00	No Liability Claim - Derivative
36 MORTGAGE RISK MANAGEMENT PTY LTD.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19359	\$6,880,400.00	\$6,880,400.00	No Liability Claim - Derivative
37 NARRABI SHIRE COUNCIL	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32643	\$663,340.00	\$663,340.00	No Liability Claim - Derivative
38 NARRABRI SHIRE COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32657	\$3,360,599.00	\$3,360,599.00	No Liability Claim - Derivative
39 PARKES SHIRE COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/24/2008	867	Undetermined	Undetermined	No Liability Claim - Derivative
40 PITTWATER COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32648	\$2,163,334.00	\$2,163,334.00	No Liability Claim - Derivative



## OMNIBUS OBJECTION 417: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
41 PITTWATER COUNCIL	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32668	\$312,160.00	\$312,160.00	No Liability Claim - Derivative
42 PORT STEPHENS COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	11/24/2008	865	Undetermined	Undetermined	No Liability Claim - Derivative
43 PRESCARE ABN 85338603114	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/09/2009	11002	\$833,505.32	\$833,505.32	No Liability Claim - Derivative
44 ROCK BUILDING SOCIETY LIMITED, THE - ABN 16 067 765 717	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32652	\$3,302,800.00	\$3,302,800.00	No Liability Claim - Derivative
45 SHIRE OF AUGUSTA-MARGARET RIVER COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32654	\$1,279,835.00	\$1,279,835.00	No Liability Claim - Derivative
46 SHIRE OF AUGUSTA-MARGARET RIVER COUNCIL	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32661	\$273,140.00	\$273,140.00	No Liability Claim - Derivative
47 TENTERFIELD SHIRE COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32656	\$2,477,100.00	\$2,477,100.00	No Liability Claim - Derivative
48 TENTERFIELD SHIRE COUNCIL	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32674	\$429,220.00	\$429,220.00	No Liability Claim - Derivative
49 TOWN OF KWINANA	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32675	\$1,053,540.00	\$1,053,540.00	No Liability Claim - Derivative
50 TOWN OF KWINANA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32677	\$3,963,360.00	\$3,963,360.00	No Liability Claim - Derivative

## OMNIBUS OBJECTION 417: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
51 TRUSTEES OF DE LA SALLE BROTHERS	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/15/2009	13059	\$3,282,816.00	\$3,282,816.00	No Liability Claim - Derivative
52 TUMUT SHIRE COUNCIL & SNOWY WORKS & SVCS	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32651	\$2,840,408.00	\$2,840,408.00	No Liability Claim - Derivative
53 TUMUT SHIRE COUNCIL & SNOWY WORKS & SVCS	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32682	\$273,140.00	\$273,140.00	No Liability Claim - Derivative
54 WALCHA COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32662	\$1,073,410.00	\$1,073,410.00	No Liability Claim - Derivative
55 WELLINGTON SHIRE COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32658	\$1,279,835.00	\$1,279,835.00	No Liability Claim - Derivative
56 WELLINGTON SHIRE COUNCIL	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32685	\$351,180.00	\$351,180.00	No Liability Claim - Derivative
57 WOOLLAHRA MUNICIPAL COUNCIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32680	\$7,307,445.00	\$7,307,445.00	No Liability Claim - Derivative
58 WOOLLAHRA MUNICIPAL COUNCIL	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	32683	\$1,386,085.00	\$1,386,085.00	No Liability Claim - Derivative
TOTAL					\$91,022,474.17	\$91,022,474.17	

**EXHIBIT D**  
**(Proposed Order – ECF No. 38010)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
 :  
**Debtors.** : **(Jointly Administered)**  
-----X

**ORDER GRANTING THE FOUR HUNDRED EIGHTEENTH  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the four hundred eighteenth omnibus objection to claims, dated June 18, 2013 (the “Four Hundred Eighteenth Omnibus Objection to Claims”),<sup>4</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the No Liability Claims to the extent that they assert claims for which the applicable Chapter 11 Estates do not have any liability, all as more fully described in the Four Hundred Eighteenth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Eighteenth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Eighteenth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and

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<sup>4</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Eighth Omnibus Objection to Claims.

factual bases set forth in the Four Hundred Eighteenth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the Four Hundred Eighteenth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto (collectively, the “No Liability Claims”) are disallowed and expunged, with prejudice, to the extent set forth therein; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A annexed to the Four Hundred Eighteenth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto and (ii) the portion of any No Liability Claim that is not the subject of the Four Hundred Eighteenth Omnibus Objection to Claims; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

## OMNIBUS OBJECTION 418: EXHIBIT 1 - NO LIABILITY CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 BANC OF AMERICA CREDIT PRODUCTS, INC.	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	22001	\$23,517,759.45 *	\$23,517,759.45*	Claim 22001 is duplicative of Claim 22060.
2 CLOSE TRUSTEES GUERNSEY LIMITED AS TRUSTEES OF THE YELLOW BRICK ROAD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	10/22/2009	44421	\$119,380.00	\$119,380.00	Claim 44421 is based on a Lehman Programs Security that does not include a valid electronic instruction reference number or blocking reference number as required by this Court's July 2, 2009 order setting forth the procedures and deadlines for filing proofs of claim in these chapter 11 cases.
3 LOOMIS SAYLES SECURITIZED ASSET FUND	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/12/2009	1687	\$199,335.94	\$199,335.94	Claim is 1687 is based on a "pair off transaction." The Debtors' records reflect that LBHI has no liability to claimant relative to such transaction.
4 PALM BEACH COUNTY TAX COLLECTOR	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/14/2009	12232	\$30,619.34 *	\$30,619.34*	Claim is 12232 is based on property taxes owed by Lehman Brothers Inc., a non-Debtor entity. LBHI has no liability to claimant relative to such property taxes.
TOTAL					\$23,867,094.73	\$23,867,094.73	

**EXHIBIT E**  
**(Proposed Order – ECF No. 38012)**



**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
<b>In re</b>	: <b>Chapter 11 Case No.</b>
	:
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	: <b>08-13555 (JMP)</b>
	:
<b>Debtors.</b>	: <b>(Jointly Administered)</b>
-----X	

**ORDER GRANTING FOUR HUNDRED NINETEENTH OMNIBUS  
OBJECTION TO CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)**

Upon the four hundred nineteenth omnibus objection to claims, dated June 18, 2013 (the “Four Hundred Nineteenth Omnibus Objection to Claims”),<sup>5</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to disallow and expunge the Insufficient Documentation Claims, all as more fully described in the Four Hundred Nineteenth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Nineteenth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Nineteenth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Nineteenth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

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<sup>5</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Nineteenth Omnibus Objection to Claims.

ORDERED that the relief requested in the Four Hundred Nineteenth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Four Hundred Nineteenth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

OMNIBUS OBJECTION 419: EXHIBIT 1 - INSUFFICIENT DOCUMENTS CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
1 COLLINS STEWART LLC	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	20291	\$6,253,037.58	\$6,253,037.58	None
2 MARBLE FINANCE LIMITED	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	27815	Undetermined	Undetermined	None
3 MARBLE FINANCE LIMITED	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	27866	Undetermined	Undetermined	None
4 STAUSS, TOM	09-17331 (JMP)	Merit, LLC	06/01/2010	66715	Undetermined	Undetermined	None
TOTAL					\$6,253,037.58	\$6,253,037.58	

**EXHIBIT F**  
**(Proposed Order – ECF No. 38014)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
<b>In re</b>	<b>: Chapter 11 Case No.</b>
	<b>:</b>
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	<b>: 08-13555 (JMP)</b>
	<b>:</b>
<b>Debtors.</b>	<b>: (Jointly Administered)</b>
-----X	

**ORDER GRANTING THE  
FOUR HUNDRED TWENTIETH OMNIBUS  
OBJECTION TO CLAIMS (EMPLOYMENT-RELATED CLAIMS)**

Upon the four hundred twentieth omnibus objection to claims, dated June 18, 2013 (the “Four Hundred Twentieth Omnibus Objection to Claims”),<sup>6</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking disallowance and expungement of the Employment-Related Claims to the extent that they assert claims for which LBHI has no liability, all as more fully described in the Four Hundred Twentieth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Twentieth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief requested in the Four Hundred Twentieth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred

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<sup>6</sup> Terms not defined herein shall have the same meaning ascribed to them in the Four Hundred Twentieth Omnibus Objection to Claims.

Twentieth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Four Hundred Twentieth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto under the heading “*Amounts to be Disallowed*” are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim or portion of any claim listed on Exhibit A annexed to the Four Hundred Twentieth Omnibus Objection to Claims that does not appear on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**



OMNIBUS OBJECTION 420: EXHIBIT 1 - EMPLOYMENT-RELATED CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	AMOUNTS NOT SUBJECT TO THIS OBJECTION
1 EPSHTEYN, BORIS	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/16/2009	13375	\$13,140.00	\$13,140.00	None
2 JOHNSON, HEIDI	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/16/2009	33280	\$225,137.37	\$225,137.37	None
3 TSESMELIS, NICOLE E.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	03/10/2009	3287	\$10,913.95 *	\$10,913.95 *	Undetermined
4 VASHISHT, VISHAL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/23/2009	2354	\$175,000.00	\$175,000.00	None
TOTAL					\$424,191.32	\$424,191.32	\$0.00

**EXHIBIT G**  
**(Proposed Order – ECF No. 38018)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
 :  
**Debtors.** : **(Jointly Administered)**  
-----X

**ORDER GRANTING FOUR HUNDRED TWENTY-FIRST  
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY DERIVATIVES CLAIMS)**

Upon the four hundred twenty-first omnibus objection to claims, dated June 18, 2013 (the “Four Hundred Twenty-First Omnibus Objection to Claims”),<sup>7</sup> of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664] (the “Procedures Order”), seeking disallowance and expungement of the No Liability Derivatives Claims on the grounds that they assert claims for which LBHI, Lehman Brothers OTC Derivatives Inc., and Lehman Brothers Special Financing Inc. (together, the “Chapter 11 Estates”) have no liability, all as more fully described in the Four Hundred Twenty-First Omnibus Objection to Claims; and due and proper notice of the Four Hundred Twenty-First Omnibus Objection to Claims having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) the claimants listed on Exhibit

<sup>7</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Twenty-First Omnibus Objection to Claims.

A attached to the Four Hundred Twenty-First Omnibus Objection to Claims; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and the Court having found and determined that the relief sought in the Four Hundred Twenty-First Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred Twenty-First Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Four Hundred Twenty-First Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the Four Hundred Twenty-First Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2013  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

**Exhibit 1**

## OMNIBUS OBJECTION 421: EXHIBIT 1 - NO LIABILITY DERIVATIVE CLAIMS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 PENN VIRGINIA CORPORATION	08-13893 (JMP)	Lehman Brothers OTC Derivatives Inc.	09/21/2009	22266	\$14,134,590.00	\$14,134,590.00	No Liability Claim - Derivative
2 PVHA/SIMS VENTURES, LLC	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28240	Undetermined	Undetermined	No Liability Claim - Derivative
3 PVHA/SIMS VENTURES, LLC	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	28241	Undetermined	Undetermined	No Liability Claim - Derivative
TOTAL					\$14,134,590.00	\$14,134,590.00	